



DIVERSE COMMUNICATIONS, INC.

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March 6, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for Diverse Communications, Inc. ("Diverse") regarding the Connect America Phase II network experiments. Diverse appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

A handwritten signature in cursive script that reads 'George Wirt'.

George Wirt
General Manager
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(309) 334-2150

Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

Diverse Communications, Inc. (“Diverse”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is Stage 1 of the FCC’s Phase II experiment proposals and Diverse anxiously awaits release of the Stage 2 formal proposal requirements.

Background

Diverse has been in the telecommunications industry since 2000 deploying high quality voice as well as broadband services today. Diverse is certificated as a competitive local exchange carrier (“CLEC”) in Illinois and is an affiliate of, and operated by, Woodhull Telephone Company (“Woodhull”) which is an incumbent local exchange carrier (“ILEC”) and was founded in 1950. Woodhull and Diverse have a proven success rate of deploying rural high-speed last mile broadband networks and voice services. As a CLEC based in Alpha, Illinois and operating in the surrounding areas, Diverse has Eligible Telecommunication Carrier (“ETC”) status and CLEC authority within the state of Illinois. Diverse and Woodhull are current recipients of Universal Service Funding; therefore our organization has extensive experience with the requirements of filing required reports and maintaining support.

Proposed Service Area

Diverse’s proposed service area is located in northwest Illinois and covers the following census tract numbers which are located in Henry County, Illinois: 17073030500, 17073030600, 17073030800, 17073031000, 17073031100, and 17073031200. Completion of the proposed project would represent an edge out from our current operations. Based on the Federal Communication Commissions (“FCC”) Public Notice, DA 14-154, report dated February 5, 2014 for price cap areas, the proposed project is estimated to provide broadband access to a total of 164 eligible high cost locations once completed, with 57 locations considered as extremely eligible high cost locations.

Diverse is unable to determine the total number of Community Anchor Institutions (“CAIs”) located within the proposed project since the eligible unserved high cost census blocks within the six selected census tracts have yet to be identified, however Diverse and Woodhull currently services many CAIs within their current service area and, if funded, could offer scalable high-speed broadband and voice to CAIs located within the proposed service area.

Broadband Technology

Diverse anticipates using Fiber-to-the-Premise (“FTTP”) for this proposed project area in order to build a high-speed, robust, scalable broadband network. The proposed area, in particular census tract 17073031200, is adjacent to Diverse’s current service area and the current network can be added on to provide service to the proposed area. The FTTP network architecture would provide a robust, broadband networking solution that offers virtually unlimited bandwidth and the flexibility to meet the customer demand. FTTP technology will enable Diverse the ability to offer a variety of communications and entertainment services, including carrier-class telephony, high-speed Internet access, digital media, Voice over Internet Protocol (VoIP), and interactive, two-way broadband services. Diverse has extensive experience with building and maintaining an extensive telecommunications network.

Service Offerings

The service offerings anticipated by Diverse are voice service, video service, and high-speed broadband service. Initially, Diverse expects to offer broadband speeds, both asymmetrical and symmetrical, to all homes and businesses passed, including CAIs within the proposed project area at the following speeds: 3 Mbps, 10 Mbps, 20 Mbps, and 30 Mbps. Higher speeds may be made available as necessary. The pricing for the proposed service offerings have not yet been determined by Diverse, but is expected to be similarly priced with services offered currently in its current operating area. Diverse estimates the project to be completed within 18 to 24 months of project award.

Funding

Once the final rules and budget for the Rural CAF Experiment are released by the FCC, Diverse will better define the project and costs applicable should a formal proposal be submitted. At this time, based on the current information available, Diverse is unable to determine the total cost of the proposed project since the eligible unserved high cost census blocks within the six selected census tracts have yet to be identified. In order to get the proposed project started, Diverse anticipates requesting funding as one time support. The funding request will be due to the cost of building a robust, scalable, high-speed broadband and voice network in rural Illinois.

Conclusion

Once the eligible census blocks are released by the FCC and reviewed by Diverse, we will be able to identify where the unserved population is located in proximity to our current facility. As an experienced telecommunications provider, with proper funding, we can serve these nearby customers more feasibly than anyone out there for voice and high-speed broadband. Diverse knows how to serve their customers and has a proven track record in overbuilding an exchange and offering quality services. Diverse has everything already in place to make this a successful project. Diverse has the proper billing system, the switch, telecom accountant, telecom consultant, outside plant engineering firm and a good telephone board that has always taken care of its customer's needs. The experienced staff is extremely knowledgeable and holds the resources to complete the proposed overbuild and deliver advanced services to each person who lives and works within the proposed service area.

By funding the proposed project, Diverse can reach out to neighboring areas that lack access to high-speed broadband capabilities in northwest Illinois. Diverse appreciates the opportunity that the FCC is providing by allowing a rural competitive exchange carriers to submit an Expression of Interest for the Rural CAF Experiment. As stated above, Diverse is considering a FTTP network build within six census tracts that are located in Henry County Illinois. The Diverse proposed fiber network would provide the residents, businesses, and CAI's with a high-speed, robust, scalable broadband networking solution that offers virtually unlimited bandwidth to areas that have been lacking service.

Diverse is committed to providing a solution to the challenges the residents and businesses within the proposed serving area have with the current lack of high quality and dependable high speed broadband. Diverse is an experienced, dedicated, and committed telecommunications provider. Due to the anticipated high cost of the project, the proposed project cannot be completed without FCC funding. Thank you for taking this proposed project into consideration as the final rules and budget are set for the available experiments.